

Attachment A

Summary

of the

Process for the

Closure of

RCRA Operable Units 4, 7, 9, 10 and 11

of the

Rocky Flats Plant.

DISCLAIMER: This summary is intended to clarify the process for the closure of the listed RCRA units as that process is identified in the IAG Statement of Work and referenced paragraphs of the IAG. Nothing contained in this summary or omitted from the IAG or the Statement of Work shall relieve any Party to the IAG from full compliance with the agreement.

To reduce or eliminate recurring references to the IAG, the Statement of Work, submittal schedules, and EPA and State responsibilities, the following conventions have been applied. Unless otherwise indicated, references to Sections are to those in the IAG Statement of Work, references to Paragraphs are to those in the IAG, references to comment or review are to EPA and the State, references to review and/or approval are to EPA and the State (or State only) and reference to Table 6 is to the Table 6 milestone schedules of the IAG Statement of Work. Requirements are singularly applicable to each RCRA closure unit listed in this attachment.

PHASE I

- Step 1** DOE shall resubmit and/or amend the source characterization section of the existing Closure Plans as draft Phase I RFI/RI Workplans (or, for any unit without a closure plan, include in an RFI/RI Workplan) for review and comment.
- Step 2** DOE shall revise the draft Phase I RFI/RI Workplan to reflect comments and shall resubmit for approval per Table 6. Implementation of the approved work plan will include field work designed to characterize sources/soils of the interim status unit, which shall provide the information to determine the risk associated with the source of contamination.
- Step 3** DOE shall submit a Draft Phase I RFI/RI Report for review and comment. This draft report shall be used by the State to identify additional work to be performed and provide information to support a draft Baseline Risk Assessment to be submitted as a chapter of the draft Phase I RFI/RI Report.
- Step 4** DOE shall revise the Draft Phase I RFI/RI Report to address all comments and resubmit the report as a final version to the State for review and approval.
- Step 5** Subsequent to the State's approval of the Final Phase I RFI/RI Report, DOE shall submit a draft Proposed Phase I IM/IRA Decision Document which shall be:

- o prepared in accordance with Paragraphs 15 and 150,
- o consistent with guidance in the preamble to the NCP (55 FR 8704, March 8, 1990), and
- o consistent with CHWA Closure requirements 6CCR 1007-3, Part 265, Subpart G (The IM/IRA Decision Document plus the Phase I RFI/RI Report constitute the closure plan.)

additionally it will:

- o provide the information required to recommend an alternative consistent with the State's closure requirements,
- o address all hazardous substance source areas with risk levels greater than $10E-6$, or Hazard Index greater than 1.0, evaluated at the source, and,
- o require the cleanup of all source areas exhibiting risk levels greater than $10E-6$, or Hazard Index greater than 1.0, evaluated at the source,

and it shall be a concise document that:

- o indicates the objectives of the IM/IRA,
- o discusses alternatives, if any, that were considered,
- o provides the rationale for the alternatives considered,
- o presents EPA approved ARAR analyses, and
- o discusses how the interim remedy selected will be consistent with the final remedy for the OU.

Step 6 Following review and comment on the draft Proposed Phase I IM/IRA Decision Document, DOE shall incorporate comments and submit a Proposed Phase I IM/IRA Decision Document for EPA, State and public comment. Concurrently, a public comment period shall be opened by the State to satisfy the public comment requirements for draft closure plans and permit modifications. DOE shall hold a public hearing if requested by the public, EPA or the State.

Step 7 DOE shall submit a Final IM/IRA Decision Document and Responsiveness Summary for approval in accordance with Paragraph 150.

As provided in Paragraph 150, DOE agrees that it shall develop and implement an IRA/IM as required by EPA and the State:

EPA and DOE shall jointly select the IRA in the IRA portion of the IM/IRA Decision Document. If EPA does not agree with DOE's proposed selection, or DOE fails to propose an IRA, EPA shall select the IRA.

The State shall select the IM in the IM portion of the IM/IRA Decision Document, except as provided in Paragraph 153 (purely radioactive substances).

The IMs/IRAs shall, to the greatest extent practicable, attain ARARs and be consistent with and contribute to the efficient performance of the final response actions consistent with section 121 of CERCLA.

The following steps, as provided for in the "Environmental Restoration Schedule, August 14, 1991" and described here shall be followed to implement the selected IM/IRA:

- Step 8 In accordance with the decision of EPA and the State as embodied in the IM/IRA Decision Document, DOE shall prepare a Title I Design.
- Step 9 In accordance with Table 6, DOE shall submit an IM Design (CD/RD) Work Plan (with Title II Design schedules) to implement the IM/IRA Decision.
- Step 10 DOE shall submit a Phase I IM/IRA Implementation Document which shall include the (draft) Title II Design (with draft construction schedules).
- Step 11 Following review and comment on the proposed Phase I IM/IRA Implementation Document, DOE shall incorporate comments and submit a (final) IM Title II Design (with final construction schedules).
- Step 12 Following review and approval of the IM Title II Design, DOE shall open contract negotiations for construction, prepare plans and procedures, mobilize, and begin Phase I IM/IRA Construction.
- Step 13 DOE shall initiate Performance Monitoring and Assessment which shall be followed by a Performance Assessment Report.
- Step 14 EPA/CDH/DOE shall review the Performance Assessment Report.
- Step 15 DOE shall continue Performance Monitoring as specified in the "Environmental Restoration Schedule, August 14, 1991".

PHASE II

- Step 1 DOE shall submit, for review and comment, a draft Phase II RFI/RI Workplan to evaluate the nature and extent of contamination resulting from the release of hazardous substances from the operable unit.
- Step 2 DOE shall revise the Phase II RFI/RI Workplan in accordance with comments and shall submit a Final Phase II RFI/RI Workplan for review and approval. The Final plan shall implement field work to evaluate the impact of each interim status closure unit on:
 - o surface water,
 - o ground water,
 - o air,
 - o the environment, and
 - o biota.
- Step 3 Following implementation of the Final Phase II RFI/RI Workplan, DOE shall prepare a Draft Phase II RFI/RI Report. The report shall evaluate the IM/IRA to have been implemented at each source and shall include draft comprehensive Baseline Risk Assessments for both sources and resultant environmental contamination.
- Step 4 The State shall use the Phase II RFI/RI Report to evaluate the need for further field work. If no additional work is warranted, the draft Phase II RFI/RI Report shall be approved as a Final Phase II RFI/RI Report. The report shall also provide information to support a draft Phase II CMS/FS Report.

- Step 5 DOE shall submit, for review and comment, a draft Phase II CMS/RS Report to evaluate corrective/remedial measures to address both the sources and contamination resulting from the sources.
- Step 6 DOE shall revise the Phase II CMS/FS Report in accordance with comments and shall submit a Final Phase II CMS/FS Report for review and approval. After review, if no other revision or work is required, the Phase II CMS/FS Report will be approved as a Final CMS/FS Report.

Remedy Selection will then proceed in accordance with the process (ignore references to OU-3, etc.) specified in Section I.B.9. Remedy Selection Documentation as follows:

- Step 7 DOE shall submit a draft Proposed Plan for review and comment simultaneously with submittal of the Final CMS/RS Report.
- Step 8 EPA and the State will comment on the draft Proposed Plan and DOE must formally respond to the comments prior to issuance of the Final Proposed Plan. Comments, and responses to comments, must be summarized in the Final Proposed Plan. Additionally, both the comments and responses must be placed in the Administrative Record and incorporated in the Final Proposed Plan prior to the public comment period. DOE shall subsequently submit the Final Proposed Plan for EPA, State and public comment.
(The final document shall be submitted in accordance with the Table 6 or within 60 days of receipt of comments on the draft document.)
- Step 9 Concurrent with the submittal of the Final Proposed Plan, the State shall prepare, and issue, a draft proposed RCRA permit modification consistent with the Final Proposed Plan and open a public comment period in accordance with 6 CCR 1007-3, Part 100.60 (See Paragraph 155).
- Step 10 DOE shall submit a draft Responsiveness Summary, for review and comment, as specified in Table 6 or within 60 days of the end of the public comment period.
- Step 11 DOE shall submit a Final Responsiveness Summary simultaneously with a draft CAD/ROD for approval in accordance with Table 6 or within 60 days of the receipt of comments on the draft Responsiveness Summary.

Upon modification of the State RCRA permit the CAD/ROD will be approved in accordance with Paragraph 156 as follows:

- Step 12 DOE and EPA, in consultation with the State, shall select the Remedial Action for each OU, taking into consideration comments received during the Final Proposed Plan comment period.
- Step 13 The State, in consultation with EPA, shall select the Corrective Action, except as provided in Paragraph 153 (re: purely radioactive substances), and shall prepare a CAD describing such decision.

DOE shall implement the Corrective Action/Remedial Action (CAD/ROD) in accordance with Section XIV (ignore references to OU-3, etc.) as follows:

- Step 14 In accordance with the decision of EPA and the State as embodied in the CAD/ROD, DOE shall implement the required action in accordance with Table 6 or as specified within the CD/RD Workplan. All plans,

designs and schedules shall be subject to approval prior to implementation.

Step 15 DOE shall submit Corrective/Remedial Design (CD/RD) Workplans, in accordance with Table 6 or concurrently with the submittal of the Final CAD/ROD, to implement the CAD/ROD. The CD/RD Workplans shall include:

- o schedules (non Table 6) delineating the development of the CD/RD Design,
- o schedules (non Table 6) for submittal of the CD/RD, and
- o a detailed discussion of the specific CD/RD tasks necessary to implement the approved remedy, including technical approach, plans and specifications to be produced.

Step 16 Should DOE determine that additional studies are necessary to supplement the technical data so that optimum treatment or disposal methods may be determined, DOE shall notify the EPA and the State in writing. If EPA/State agree, the schedule and detail of necessary work will be incorporated in the CD/RD Workplan and include a SAP consisting of a QAPP and FSP.

Step 17 DOE shall provide results of any additional studies and describe the effects upon the work in a technical memorandum which shall be scheduled in the approved CD/RD Workplan.

Step 18 Following corrections or modifications based on comments, information in the technical memorandum shall be incorporated into the CD/RD.

Step 19 The CD/RD shall be submitted for approval in accordance with the approved CD/RD Workplan schedule. The CD/RD shall provide:

- o design information necessary to implement the approved CAD/ROD,
- o a detailed schedule defining all activities critical to the start and completion of CA/RA construction, and
- o include provisions for long term operation and maintenance of the remedy as required by CERCLA.

Step 20 Within 60 days of completion of the CA/RA, DOE shall submit, by registered mail, a certification of completion of the CA/RA.

ATTACHMENT B

INTEGRATION OF IAG AND CHWA CLOSURE PROCESSES
FOR

RCRA UNITS SCHEDULED FOR INTERIM STATUS CLOSURE

AFFECTED OPERABLE UNITS (OUs)

OU-4 SOLAR EVAPORATION PONDS
OU-7 PRESENT LANDFILL
OU-9 OLD PROCESS WASTE LINES (OPWL)
OU-10 OUTSIDE CLOSURES
OU-11 WEST SPRAY FIELD

IAG PROCESS

Phase I RFI/RI
and
Phase I IM/IRA

CLOSURE PROCESS

CHWA 265.110
265.111
265.112 (Closure Plan)
265.113
265.114
265.115 (If clean-closed)
265.116
265.117* (Post Closure Plan)
265.118*
265.119*
265.120*
265.197, 265.310 (OPWL)
265.118, 265.310 (Solar Pond)
265.310, (Present Landfill)
265.280, 265.310 (W. Spray Field)
265.197, 265.310 (Outside Closures)

Phase II RFI/RI

CMS/FS

CAD/ROD

Continued Post Closure Care with possible
modifications due to Phase II RFI/RI data*

*Requirements of these sections need only be met when applicable,
i.e. when clean closure may not or will not be possible.